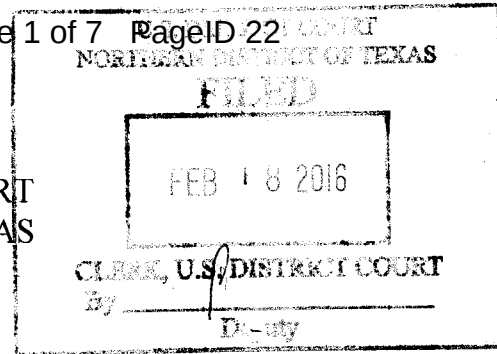


ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION



UNITED STATES OF AMERICA

v.

TONY BRANDON TANNER

NO.

INDICTMENT

The Grand Jury Charges:

Count One

Production of Child Pornography
(Violation of 18 U.S.C. § 2251(a) and (e))

On or about October 14, 2015, in the Dallas Division of the Northern District of Texas, **Tony Brandon Tanner**, defendant, used, persuaded, induced, enticed, and knowingly attempted to use, persuade, induce, and entice Jane Doe #1, a person under the age of eighteen (18) years, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, which were produced using materials that had been mailed, shipped, and transported in or affecting interstate or foreign commerce by any means, including by computer, by using a cellular telephone to create, and attempt to create, visual depictions of Jane Doe #1, a minor, engaged in sexually explicit conduct, as defined in 18 U.S.C. § 2256, including the following described video:

| Video File | Description |
|--|---|
| 637f0104-464a-4df7-ae0b-bc176113ee15.mp4 | A video file that focuses on the genital area of Jane Doe #1, a minor female child, who is wearing a dark colored shirt but no underwear. The video file shows Jane Doe #1 placing her fingers on her genital area. |

In violation of 18 U.S.C. § 2251(a).

Count Two
Production of Child Pornography
(Violation of 18 U.S.C. § 2251(a) and (e))

On or about November 8, 2015, in the Dallas Division of the Northern District of Texas, **Tony Brandon Tanner**, defendant, used, persuaded, induced, enticed, and knowingly attempted to use, persuade, induce, and entice Jane Doe #2, a person under the age of eighteen (18) years, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, which were produced using materials that had been mailed, shipped, and transported in or affecting interstate or foreign commerce by any means, including by computer, by using a cellular telephone to create, and attempt to create, visual depictions of Jane Doe #2, a minor, engaged in sexually explicit conduct, as defined in 18 U.S.C. § 2256, including the following described video:

| Video File | Description |
|--|--|
| 2bf55b48-07e1-47e0-a897-d7a02cd53139.mp4 | A video file that focuses on the genital area of Jane Doe #2, a minor female child, who is wearing blue underwear. The video file shows Jane Doe #2 placing her fingers in her vagina. |

In violation of 18 U.S.C. § 2251(a).

Count Three
Transporting and Shipping Child Pornography
(Violation of 18 U.S.C. § 2252A(a)(1))

On or about September 15, 2015, in the Dallas Division of the Northern District of Texas, the defendant, **Tony Brandon Tanner**, knowingly transported and shipped child pornography using a means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer. Specifically, he used the Internet to send and transmit files of minors engaged in sexually explicit conduct, as defined in 18 U.S.C. § 2256, including the following described video file:

| File name: | Description: |
|--------------------------|--|
| VID-20130816-00068_1.mp4 | A video file that begins focused on the genitals of a nude, prepubescent female child. A hand is seen manipulating the genitals of the female child. Later in the video, the female child is shown to be wearing a purple shirt with no underwear. |

In violation of 18 U.S.C. § 2252A(a)(1).

Count Four
Transporting and Shipping Child Pornography
(Violation of 18 U.S.C. § 2252A(a)(1))

On or about October 5, 2015, in the Dallas Division of the Northern District of Texas, the defendant, **Tony Brandon Tanner**, knowingly transported and shipped child pornography using a means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer. Specifically, he used the Internet to send and transmit files of minors engaged in sexually explicit conduct, as defined in 18 U.S.C. § 2256, including the following described video file:

| File name: | Description: |
|-----------------------|--|
| Kleuter_hym_foets.3gp | A video file that shows a prepubescent female child with blond hair. During the video, the female child's mouth and genitals are penetrated by a male penis. In one scene of the video, the female child is wearing a white shirt. |

In violation of 18 U.S.C. § 2252A(a)(1).

A TRUE BILL

FOREPERSON

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UNITED STATES ATTORNEY

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

THE UNITED STATES OF AMERICA

v.

TONY BRANDON TANNER

INDICTMENT

18 U.S.C. § 2251(a)
Production of Child Pornography

18 U.S.C. § 2252A(a)(1)
Transporting and Shipping Child Pornography

4 Counts

A true bill rendered

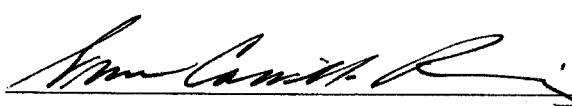
DALLAS


FOREPERSON

Filed in open court this 17th day of February, 2016.

Clerk

Warrant to be Issued


UNITED STATES MAGISTRATE JUDGE
Magistrate Court Number: 3:16-MJ-022-BF

2/18/16